

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
vs.) Case No.: 4:18-cr-975-CDP (JMB)
)
CHRISTOPHER MYERS,)
)
 Defendant.)

FIFTH MOTION TO TRAVEL

COMES NOW Defendant, Christopher Myers, by and through counsel, and moves this Court for permission to travel from St. Louis, Missouri to Grafton, Illinois from 5:00 p.m. on Friday, May 8, 2020, to 12:00 p.m. on Saturday, May 9, 2020, for the purpose of attending the birthday of a longtime friend. In support of this motion, Defendant states as follows:

1. On November 30, 2018, Defendant surrendered to the United States Marshals Service in the Eastern District of Missouri.
2. On that same date, this Court released Defendant on his own recognizance and a combination of conditions of release designed to reasonably assure his appearance as required and the safety of any other person and the community.
3. Condition 7(f) is among the conditions this Court imposed.
4. Condition 7(f) prohibits defendant from travel outside the Eastern District of Missouri.
5. On May 8, 2020, Defendant hopes to travel to Grafton, Illinois for the purpose of attending a longtime friend's birthday.
6. Grafton, Illinois sits on the Illinois side of the Mississippi River and is in the

immediate vicinity of the Eastern District of Missouri.

7. Indeed, Grafton, Illinois is closer to the St. Louis area than many points with the Eastern District of Missouri¹ to which Defendant can travel without court authorization.
8. If permitted to travel, Defendant will leave for Grafton at 5:00 p.m. or just after on Friday, May 8, 2020, and return to his home in the Eastern District of Missouri no later than Saturday, May 9, 2020, at 12:00 p.m.
9. Defendant has travelled on four prior occasions without incident, including travel with family to the Southern District of Florida almost one year ago.
10. Defendant has incurred no bond violations since admitted to bail on November 30, 2018, almost 18 months ago.
11. On yesterday's date, Defendant, through counsel, attempted to discuss this matter with Pretrial Services Officer Jameka Taylor. Ms. Taylor was unavailable for comment.
12. On today's date, Defendant, through counsel, attempted to discuss this matter with Assistant United States Attorney Jennifer Winfield. Ms. Winfield was likewise unavailable for comment.

WHEREFORE, Defendant respectfully requests this Court permit him to travel from St. Louis, Missouri to Grafton, Illinois from 5:00 p.m. on Friday, May 8, 2020, to 12:00 p.m. on Saturday, May 9, 2020, for the purpose of attending the birthday of a longtime friend.

¹ The Eastern District of Missouri runs approximately 361.9 miles, north to south, and 110 miles, east to west.

Respectfully submitted,

ROSENBLUM, SCHWARTZ & FRY, PC

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CERTIFICATE OF SERVICE

I hereby certify that on May 7, 2020, the foregoing was electronically filed with the Clerk of the Court to be served by operation of the Court's electronic filing system upon Ms. Jennifer Winfield, Assistant United States Attorney.